

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ARTHUR B. HERNANDEZ,)	
)	
Plaintiff)	
v.)	CIVIL NO. 3:07-cv-00597
)	
EQUIFAX INFORMATION SERVICES, LLC,)	
et al.)	
Defendants.)	

PLAINTIFF'S MOTION TO COMPEL AND FOR DISCOVERY SANCTIONS

COMES NOW, the Plaintiff, Arthur Hernandez, by counsel, and for the reasons more fully articulated in the accompanying memorandum, moves that this Court overrule the Defendant's objections, compel the Defendant to fully answer discovery, and enter Rule 37(a) and Rule 37(c) sanctions as appropriate.

Respectfully submitted,
ARTHUR HERNANDEZ,

_____/s/
MATTHEW J. ERAUSQUIN, VSB#65434
Counsel for the Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
3615-H Chain Bridge Road
Fairfax, VA 22030
Tel: 703-273-7770
Fax: 888-892-3512
matt@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of February, 2008, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

Curtis G. Manchester
Reed Smith LLP
901 East Byrd Street, Suite 1700
Richmond, VA 23219
(804) 344-3436
(804) 344-3410 (fax)
cmanchester@reedsmith.com

/s/

MATTHEW J. ERAUSQUIN, VSB#65434
LEONARD A. BENNETT, VSB #37523
Counsel for the Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
3615-H Chain Bridge Road
Fairfax, VA 22030
Tel: 703-273-7770
Fax: 888-892-3512
matt@clalegal.com